

Hon. Paul A. Engelmayer
United States District Court
for the Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

October 1, 2024

**Re: Jane Street Group, LLC v. Millennium Management LLC, Douglas Schadewald,
and Daniel Spottiswood, No. 1:24-cv-02783**

Dear Judge Engelmayer:

We write on behalf of Defendants Douglas Schadewald (“Schadewald”), Daniel Spottiswood (“Spottiswood,” and together with Schadewald, “Individual Defendants”) and Millennium (together with Individual Defendants, “Defendants”). Pursuant to Local Civil Rule 7.1(d) and Individual Practice Rule 4.B, we seek permission to file under seal Defendants’ Letter Motion to Compel Interrogatory Responses (the “Letter Motion to Compel”) and the exhibits to the Declaration of Brian R. Campbell in Support of Defendants’ Letter Motion to Compel (the “Exhibits”).

The Letter Motion to Compel and the Exhibits discuss areas of discovery related to Jane Street’s business. Exhibits 1 and 3 are documents produced by Jane Street and designated as Confidential – Attorney’s Eyes Only. Exhibit 2 is a document prepared based on the information from Exhibit 3, which Jane Street designated as Confidential – Attorney’s Eyes Only. Exhibit 4 is Defendants’ deficiency letter regarding Interrogatory No. 3, and Exhibit 5 is Plaintiff’s letter in response thereto. Exhibit 6 is Jane Street’s Initial Disclosures, Exhibit 7 is Defendants’ First Set of Interrogatories to Plaintiff, Exhibit 8 is Jane Street’s Responses And Objections to Defendants’ First Set of Interrogatories, and Exhibit 9 is Jane Street’s Second Supplemental Responses And Objections to Defendants’ First Set of Interrogatories. Exhibit 4 discusses material that was produced as Confidential – Attorney’s Eyes Only, and each of Exhibits 5-9 was originally designed either as Confidential or Confidential – Attorney’s Eyes Only.

The Letter Motion to Compel cites to, paraphrases, or quotes from each of the Exhibits. Because Defendants believe that Plaintiff will seek to seal portions of the Letter Motion to Compel and some or all of the Exhibits, Defendants request leave to provisionally file the Letter Motion to Compel and the Exhibits under seal. Defendants will meet and confer with Plaintiff regarding sealing or redactions of the Letter Motion and Exhibits, and to the extent Plaintiff consents, file public redacted versions of the Letter Motion and Exhibits by close of business on October 3, 2024. Defendants reserve the right to challenge any redactions proposed by Plaintiff.

Respectfully submitted,

/s/ Brian R. Campbell

Brian R. Campbell
ELSBERG BAKER & MARURI PLLC
One Penn Plaza, Suite 4015
New York, NY 10119
bcampbell@elsberglaw.com

*Counsel for Defendants
Douglas Schadewald and
Daniel Spottiswood*

/s/ Andrew J. Levander

Andrew J. Levander
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036
andrew.levander@dechert.com

*Counsel for Defendant
Millennium Management LLC*